UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	X	
TELECOM BUSINESS SOLUTION, LLC, et al.,	:	Civil Action No.: 1:22-cv-01761
	:	
Petitioners,	:	Judge Lewis A. Kaplan
V.	:	
	:	Magistrate Judge Robert W.
TERRA TOWERS CORP., et al.,	:	Lehrburger
	:	
Respondents.	:	

NOTICE OF MOTION FOR LEAVE TO FILE AMENDED PETITION UNDER SEAL

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Their Motion for Leave to File Amended Petition Under Seal, dated March 3, 2022, and the exhibit attached thereto, Petitioners Telecom Business Solution, LLC, LATAM Towers, LLC, and AMLQ Holdings (Cay) Ltd., by and through undersigned counsel, hereby move this Court, pursuant to Federal Rule of Civil Procedure 5.2(d), for an Order granting leave to file under seal Petitioners' Amended Petition to Confirm Partial Final Award, together with a supporting memorandum of law, declaration, and exhibits annexed thereto.

Dated: March 3, 2022

By: /s/ David A. Landman

David A. Landman

ULMER & BERNE LLP

275 Madison Avenue, Suite 2002 New York, New York 10016-1138

Phone: (917) 262-0470 Fax: (917) 262-0480 dlandman@ulmer.com

Michael N. Ungar (pro hac vice forth

(pro hac vice forthcoming) Katherine M. Poldneff

(pro hac vice forthcoming)

(pro nac vice forthcoming)
Gregory C. Djordjevic

(pro hac vice forthcoming)

ULMER & BERNE LLP

1660 West 2nd Street, Suite 1100 Cleveland, Ohio 44113-1406

Phone: (216) 583-7000 Fax: (216) 583-7001 mungar@ulmer.com kpoldneff@ulmer.com gdjordjevic@ulmer.com

Counsel for Petitioners Telecom Business Solution, LLC and LATAM Towers, LLC

Respectfully submitted,

By: /s/ Gregg L. Weiner

Gregg L. Weiner Ethan Fitzgerald

ROPES & GRAY LLP

1211 Avenue of the Americas New York, New York 10036-8704

Phone: (212) 596-9000 Fax: (212) 596-9090

gregg.weiner@ropesgray.com ethan.fitzgerald@ropesgray.com

Daniel V. Ward

(pro hac vice forthcoming) Katherine M. McDonald

(pro hac vice forthcoming)

ROPES & GRAY LLP

Prudential Tower 800 Boylston Street

Boston, Massachusetts 02199-3600

Phone: (617) 951-7000 Fax: (617) 951-7050

daniel.ward@ropesgray.com

katherine.mcdonald@ropesgray.com

Counsel for Petitioner AMLQ Holdings (Cay), Ltd.